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14 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,
16 Plaintiff,
v.
17 LUIS ANGEL VILLARINO,
18 Defendant.

Case No. 2:22-cr-30-RFB-DJA

19 **STIPULATION AND PROPOSED
ORDER TO DELAY SURRENDER
AND REPORT DATE (Fifth Request)**

20 IT IS HEREBY STIPULATED AND AGREED, by and between the United States
21 of America, by and through NICOLE M. ARGENTIERI, Principal Deputy Assistant
22 Attorney General and Head of the Criminal Division, MATTHEW A. LAMBERTI, Senior
23 Counsel, JASON M. FRIERSON, United States Attorney, JESSICA OLIVA, Assistant
24 United States Attorney, and LUIS VILLARINO, by and through his attorney, LANCE

1 MANINGO, that the date by which the defendant must self-surrender and report to his
2 term of imprisonment in the instant case, now scheduled for no later than seven days
3 following the conclusion of the trial in this matter (ECF No. 46), be vacated and continued
4 to a date sixty days from the date of the last sentencing in this case, currently set for
5 February 4, 2025 (ECF No. 638).

6 This stipulation is entered into for the following reasons:

7 1. The defendant has been under conditions of release since September 25, 2019,
8 Eastern District of Virginia (“EDVA”) ECF (19-cr-253-MSN), No. 43. On May 7, 2021, he
9 was sentenced to 12 months and a day in prison on one count of conspiracy to commit
10 criminal copyright infringement. EDVA ECF 494 and 496.

11 2. On June 8, 2021, after a consent motion filed by the defendant, Judge Ellis in EDVA
12 ordered him to self-surrender and report to his term of imprisonment on September 7, 2021.
13 EDVA No. 521.

14 2. On August 23, 2021, after a consent motion filed by the defendant, Judge Ellis
15 in EDVA ordered him to self-surrender and report to his term of imprisonment by February
16 1, 2022. EDVA No. 667.

17 3. On January 5, 2022, after a consent motion filed by the defendant, Judge
18 Nachmanoff in EDVA ordered him to self-surrender and report to his term of imprisonment
19 by July 18, 2022. EDVA No. 741.

20 4. On June 6, 2022, after a consent motion filed by the defendant, Judge Traum
21 ordered the defendant to self-surrender and report to his term of imprisonment no later than
22 seven days following the conclusion of the trial in this matter. ECF No. 46.

5. The additional time requested herein is sought to allow the defendant time to comply with the terms of his guilty plea agreement, and to allow the government time to evaluate whether it intends to file a motion pursuant to Rule 35(b)(2) of the Federal Rules of Criminal Procedure. The additional time is not sought for purposes of delay.

Accordingly, the parties respectfully request that the Court accept this stipulation and enter an order as set forth below, continuing the defendant's surrender and report date in the above-captioned matter to a date sixty days from the date of the last sentencing in this case, currently set for February 4, 2025. ECF No. 638.

Respectfully submitted this 18th day of November 2024.

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Principal Deputy Assistant Attorney General
Head of the Criminal Division

/s/ Matthew A. Lamberti
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Senior Counsel
MICHAEL CHRISTIN
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United States Department of Justice

JASON M. FRIERSON
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/s/ Jessica Oliva
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Assistant United States Attorney

/s/ Lance Maningo
LANCE MANINGO
Attorney for Defendant Luis Villarino

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
LUIS ANGEL VILLARINO
Defendant.

Case No. 2:22-cr-30-RFB-DJA

**[PROPOSED] ORDER TO DELAY
SURRENDER AND REPORT DATE
(Fifth Request)**

This matter coming before the Court on a Stipulation To Delay Surrender And Report Date, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

WHEREFORE, IT IS ORDERED THAT the defendant shall self-surrender and report to his term of imprisonment no later than sixty days from the date of the last sentencing in this case, currently set for February 4, 2025, ECF No. 638.

IT IS FURTHER ORDERED THAT all conditions of release set forth in the September 25, 2019 Order remain in effect. [See, United States District Court for the Eastern District of Virginia, 1:19-cr-00253-MSN, ECF 43.]

HON. RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: